

77
SEP 02 1988

Mr. Robin J. Robinson
Clean Sites Inc.
P. O. Box 216
Holden, Missouri 64040

Dear Mr. Robinson:

I am writing to provide approval in principal to the proposed amendment to the work plan for soil removal. The following are comments on the work plan as proposed.

1. Section II. A. should contain some discussion on dust suppression and run off control during the excavation and upon completion of the project.
2. Section II. B. 1. should indicate that the segments to be excavated will be marked in such a way that they may be distinguished once the excavation is complete.
3. Section II. B. 3. it is assumed that the five feet width discussed in the second cut means that the area of the second cut will extend to five feet beyond the perimeter of the stain in all directions.
4. Section II. D. should state that in the plans to be submitted a discussion concerning the means to effectively control dust emissions and erosion during and after excavation will be included.
5. The amendment does not include any discussion of the verification that the removal has been successful. Even though it is anticipated that such verification be a part of the upcoming RI/FS there should be some indication that such verification will be forthcoming.
6. The amendment does not address post excavation treatment of the areas excavated. Will regrading be done? Will the site be seeded or sodded? Will erosion control be implemented? These questions should be addressed.

The soil removal in principal is considered appropriate and the methods proposed are sound. However, final approval of the proposed amendment cannot be made until the above items are addressed.

WSTM/SPFD/SCOM:KINSER:08/15/88:SOILWP:DISK # 1

SCOM

KINSER

6 BL-88
9-1

SCOM SPFD
KOSAKOWSKI

Kos
9/1/88

SPFD

MORBY

MORBY
9/1/88

Site: Martha
ID #: MOD980633069
Break: 10-9
Other: AR
9-2-88

078D



40030603
SUPERFUND RECORDS

I understand your interest in undertaking the soil removal as soon as practicable, and EPA too desires to see this activity undertaken. It is anticipated that you should not have difficulty in responding to the six items above and EPA approval of the amendment will follow shortly. If I can be of any assistance please do not hesitate in contacting me.

Sincerely yours,

Steven E. Kinser
Remedial Project Manager
Compliance Section
Superfund Branch
Waste Management Division